Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Amendment of Several Parts of the Commission's Rules to Cause More Efficient Use of All Commercial Radio Spectrum

RM-_____

PETITION FOR RULEMAKING

1) I am an Amateur Radio Operator with a Technician Class License. My call sign is WA1OCK. I hold a General Radio Telephone License with Ship Radar endorsement. I was employed as an operations and maintenance engineer in the Television Broadcast industry for over thirteen years. I have been employed as a chief engineer for both AM and FM broadcast stations. I have done radio service for Land Mobile Radio Service users. I am concerned with the future of the Land Mobile Radio Service.

2) I cannot sit back and silently listen over and over to repeated cries of the Land Mobile Radio Service (LMRS) begging to the tune of "I want more megahertz". Docket 87-14 was just one chapter in the monthly publication: "Un-necessary Reallocations" often published by the Commission. While there may be a few rare needs to reallocate amateur radio spectrum, some are only necessary because the LMRS has not opened their eyelids. The Commission has not ordered the land mobile radio users to see and utilize what radio amateurs have known for decades - limited government regulation allowing both reasonable and constructive spectrum sharing can work for the benefit of users.

3) There is absolutely no need for special frequencies or transmitters for radio data services if some limited sharing between all commercial radio services is allowed. Innovative and flexible sharing can hold the key to far more efficient radio spectrum utilization. Sharing can include both hardware and frequency. All of the protected-coverage transmitters including Mobile Relay, Community Repeater, Trunking, and Cellular could be used for data services. All primary users could be required to use subaudible tone squelch. The primary users would not know or care that when they stop using their voice radio system, other users gain limited access to both the transmitter and the frequency.

4) The transmitters in these dedicated full-time shared services could be left on continuously. Carrier squelch receivers would be affected. Service rules requiring subaudible decode and encode would cause such problems to quickly fade away and become a rather moot issue.

5) All commercial transmitters with reasonably low duty cycles could be used including police, fire, and public safety. With sympathised radios, there actually is no need to limit user access to the current cast-in-stone frequency allocations as now exists. Most commercial frequencies should be able to be used by other services in ways that could yield interesting benefits to both services.

6) Public safety entities might gain by sharing as the data providers line up at the front door begging to be allowed to maintain all fixed transmitters and in return being able to share in the frequencies and hardware. In this day of tight money for services, there is little question that the positive benefits are far more than negative ones. Cities and towns should be able to negotiate and lease channel idle time to data service providers and decrease tax increases.

7) This concept might require a data pointer channel but that might not even be necessary. If industry is given a green light on this concept, they will find ways to make things happen that will really dazzle us with details, confuse us with competence, and will not in the least bit baffle us with bull. They will find ways and we will all come out as real winners.

8) The recent reallocation of 220-222 MHz to land mobile allegedly for amplitude compandored single sideband (ACSB) which now seems to have been conveniently distorted into a new data stomping ground is far less than a mere drop in the bit bucket in relation to the data bits per hour that you could transfer by radio on all the commercial spectrum that the Commission is currently issuing licenses for. The Commission should realize this and return 220-222 MHz to the amateur radio service and tell commercial interests to find ways to make the commercial spectrum work better. Many live the words "I want more".

60) SUMMARY

There are a lot of things that the Commission can do to cause real improvements in communications technology. For reasons stated above, I PETITION FOR RULEMAKING. I call on the Commission to aggressively push forward towards better radio communications technology systems in our homeland. I call upon the Commission to reverse decisions on the reallocation of 220-222 MHz spectrum and to assign the spectrum to the amateur radio service on a non-shared basis. The 220-222 MHz band is not needed for data as suggested by the Commission if limited sharing of commercial spectrum is allowed to occur between licensed services.

Thank you for your consideration in this matter.

Respectfully Submitted on this, the 24th day of August, 1990

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